

**DECISION MEMO  
FOR THE  
TILLMAN TRAILS PROJECT**

USDA – Forest Service  
George Washington and Jefferson National Forests  
North River Ranger District  
Harrisonburg, Virginia

**DECISION**

I have decided to relocate the western portion of the Narrowback Trail (Trail #432) onto a sustainable grade and construct a new segment of trail that would connect to the Wolf Ridge Trail parking lot. This action will result in the construction of approximately 3 miles of trail and permanent decommissioning of 0.75 miles of the Narrowback Trail. The newly constructed trail would follow a curvilinear alignment along sustainable grades (i.e., less than 10 percent). The decommissioned section may be graded and seeded to prevent further erosion and access. Depending on feasibility at the time of new trail construction, a bridge or a ford will be used to cross the unnamed stream below Tillman Road (Road #101). If a ford is initially developed, a bridge may be built later at my discretion. Other connected actions will include new painted blazes on trees identifying the trail relocations and the addition of several directional signs.

This project occurs on the North River Ranger District of the George Washington National Forest (GWNF) in Augusta and Rockingham Counties, Virginia. Please refer to the enclosed map for more precise location information.

**PURPOSE, NEED AND BACKGROUND**

There are two needs for the action. The first need is to address resource degradation associated with unsustainable trail layout. The 0.75-mile section of the Narrowback Trail that would be decommissioned consistently exceeds grades of 15 percent and lacks adequate drainage features. At the base of the mountain, the trail crosses a series of small tributaries and wetlands without proper erosion control, resulting in a deterioration of the trail condition and increased sedimentation. The second need is to improve visitor experience. The current steep, eroded alignment has contributed to a significant drop in visitors in comparison to trails in the Tillman-Narrowback network. A sustainable trail alignment built on more moderate grades with specifications that intentionally provide an enjoyable user experience is needed to promote a diversity of trail users with varying abilities and skill levels.

The proposed action occurs on National Forest System lands within Management Prescription Area (MA) 13 Mosaics of Habitat, designated by the 2014 Revised Land and Resource Management Plan (Forest Plan) for the George Washington National Forest. MA13 is the predominant area where timber harvest is used to create and maintain ecosystem diversity objectives and where wildlife habitat management activities are focused for both ecological and recreational objectives.

## REASONS FOR CATEGORICALLY EXCLUDING THE PROPOSED ACTION

The Chief of the Forest Service has established categories of actions that can be excluded from documentation in an Environmental Assessment (EA) or an Environmental Impact Statement (EIS). In reviewing the information and evidence presented in the project record and evaluating information submitted from public, I have determined that the actions within this decision can be categorically excluded from documentation in an EIS or EA. The applicable category of action includes:

*36 CFR 220.6(e)(1) Construction and reconstruction of trails.*

This category is applicable because the evidence presented in the project record and briefly described below demonstrate that the cause-effect relationship between the actions in this decision and the degree of these effects on the resource condition result in no extraordinary circumstances. This action falls squarely within this category.

## RELATIONSHIP TO EXTRAORDINARY CIRCUMSTANCES

Direction provided in Forest Service Handbook *Environmental Policy and Procedures Handbook* 1909.15 Chapter 30 requires the Responsible Official to consider whether extraordinary circumstances related to a proposed action warrant analysis in an EA or an EIS. This project was analyzed (per FSH 1909.15, Section 30.3) by an Interdisciplinary Team for the following resource conditions and the results are as follows:

### **a. Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species:**

Potential foraging and roosting habitat for the endangered Indiana bat occur within the project area; however, no known Indiana bat hibernacula or maternity roosts exist in Augusta or Rockingham counties. Effects to the Indiana bat were determined and analyzed during formal consultation of Forest Plan activities with the US Fish and Wildlife Service (USFWS) which resulted in a Biological Assessment/ Biological Evaluation (BA/BE) dated 03 September 2020. Based on the results of the 2020 BA/BE, an effects determination of “may affect, not likely to adversely affect” was proposed for the Indiana bat. Site activities will be conducted in accordance with the Terms and Conditions of the Biological Opinion (BO) of the 2013 Revised George Washington National Forest Land & Resource Management Plan, including no trees over 9 inches DBH and no trees exhibiting roosting characteristics (i.e., sloughing bark on dead or live trees) will be felled. Therefore, “this project has no additional effect, beyond that which is already disclosed in the BA dated November 13, 2012 and by the USFWS in the BO of June 12, 2013” and the proposed actions are not likely to jeopardize the continued existence of the Indiana bat.

Suitable foraging and roosting habitat for the threatened northern long-eared bat (NLEB) occur throughout the entirety of the GWNF; however, the project area is beyond 0.25 miles of any known hibernacula, caves or known occupied roost

trees for the NLEB. Effects to the NLEB bat were determined and analyzed during formal consultation of Forest Plan activities with the US Fish and Wildlife Service (USFWS) which resulted in a Biological Assessment/ Biological Evaluation (BA/BE), dated 03 September 2020. Based on the results of the 2020 BA/BE, an effects determination of “may affect, not likely to adversely affect” was proposed for the NLEB. This project is consistent with the Forest Plan, the BO, and activities excepted from taking prohibitions under the rule adopted under the Endangered Species Act (ESA) section 4(d) rule applicable to the northern long-eared bat. Tree removal under certain conditions is an activity that is excepted from incidental take prohibitions in the final 4(d) rule.

Suitable foraging and roosting habitat is also present throughout the GWNF for the forest sensitive species the tricolored bat; however the project area is outside of known high priority hibernacula and roost sites for tricolored bats. Effects to the tricolored bat were determined and analyzed during formal consultation of Forest Plan activities with the US Fish and Wildlife Service (USFWS) which resulted in a Biological Assessment/ Biological Evaluation (BA/BE), dated 03 September 2020. Based on the results of the 2020 BA/BE, an effects determination of “may impact individuals but not likely to cause a trend to federal listing or a loss of viability” was proposed for the tricolored bat.

A no effect determination was made for Virginia Big-eared Bat (*Corynorhinus townsendii virginianus*).

A copy of the USFWS concurrence letter for the project and BA/BE is located in the project folder.

In addition, no threatened, endangered, proposed, and sensitive (TEPS) botanical species or areas of high probability potential of TEPS species habitat were identified based the Botanical Survey Report for the Proposed Tillman Trails Connectivity Project in Augusta and Rockingham Counties, Virginia dated 07 August 2020.

**b. Flood plains, wetlands, or municipal watersheds:**

A 1,341-acre watershed, located within the Briery Branch sub watershed, was established for the project based on the downstream-most part of the stream that could be directly affected by the project. The project includes one stream crossing which would occur over an unnamed tributary to Briery Branch. Briery Branch eventually drains into the North River, one of several water supply sources for the City of Harrisonburg. Effects to Briery Branch and the 1,341-acre watershed were determined and analyzed in the Aquatics Report for the Proposed Tillman Trails Connectivity Project (Aquatics Report), dated 22 June 2020. Based on the results of the Aquatics Report, the proposed project and stream crossing will have minimal effects on the stream and watershed. The stream crossing will be designed and constructed in accordance with industry best management practices, Forest Plan standards, and the erosion control practices in the Virginia Erosion and Sediment Control Handbook to minimize impacts from erosion and runoff.

There are no mapped National Wetlands Inventory Wetlands within the project area.

**c. Congressionally designated areas, such as wilderness, wilderness study areas, or national recreation areas:**

The project area is not within or adjacent to any congressionally designated areas, so there will be no effects on any congressionally designated areas.

**d. Inventoried roadless areas or potential wilderness areas:**

This project is not located in an inventoried roadless or potential wilderness area.

**e. Research natural areas:**

There will be no effect on research natural areas. The project area is not within or adjacent to a research natural area.

**f. American Indians and Alaska Native religious or cultural sites:**

No American Indian religious or cultural sites exist in the project area, so there will be no effect on any American Indian religious or cultural sites.

**g. Archaeological sites, or historic properties or areas:**

No archaeological sites or historic properties exist within the project area, so there will be no effect on these resource conditions.

Based on my knowledge of the proposed action, the area involved, the existing situation, and the environmental effects expected as a result of this action I have concluded that this decision may be categorically excluded from documentation in an environmental impact statement or environmental assessment as it is within one of the categories identified by the U.S. Department of Agriculture in 7 CFR part 1b.3 or one of the categories identified by the Chief of the Forest Service in Forest Service Handbook (FSH) 1909.15 section 32.2, and there are no extraordinary circumstances (FSH 1909.15 section 31.2) related to the decision that may result in a significant individual or cumulative environmental effect. My conclusion is based on information presented in this document and the entirety of the Planning Record.

## **PUBLIC INVOLVEMENT**

This project was listed on the Forest's Schedule of Proposed Actions (SOPA) in July of 2020.

A 30-day scoping period was initiated for this project starting on August 3, 2020. The entirety of all provided comments are available in the project record at the North Ranger District office in Harrisonburg, VA.

An Interdisciplinary Team of resource specialists reviewed the scoping comments and completed an analysis to determine the impact of this project on various resources. This team consisted of a biologist, archaeologist, hydrologist, fisheries biologist, engineer, and recreation specialist. A total of 196 submissions were received, all of which were submitted via the Forest Service's Comment Analysis and Response Application (CARA) online platform. One submission was considered a Form Letter and the rest were unique submissions. No submissions opposed the proposed project.

## **FINDINGS REQUIRED BY REGULATION AND OTHER LAWS**

This project on National Forest land has been reviewed for consistency with the Revised Forest Plan for the George Washington National Forest (GWNF Plan).

1. **Consistency with NFMA and the Forest Plan:** The Forest Plan was prepared in accordance with the National Forest Management Act (16 USC 1601-1610). The actions of this project are consistent with the Forest Plan's management desired conditions, objectives, and standards.
2. **Consistency with Other Applicable Laws:** This project is consistent with applicable state and federal laws. A listing of all of these laws would be extensive and will not be done here. However, because this project will result in some ground disturbance it is worth noting that the project does comply with the Clean Water Act, Virginia's Forestry Best Management Practices (BMPs) for Water Quality, the National Historic Preservation Act, and the Endangered Species Act.

## **IMPLEMENTATION, ADMINISTRATIVE REVIEW OR APPEAL OPPORTUNITY**

As a result of the Consolidated Appropriations Act of 2014 (Public Law No. 113-76) and the Agricultural Act of 2014 (Farm Bill, Public Law No. 102-381), this decision is not subject to administrative review or appeal and may be implemented immediately.

## **CONTACT PERSON**

The project analysis file is available for public review at the North Ranger District Office at the GWNF. Questions regarding this decision can be addressed to Jay Martin, 401 Oakwood Drive, Harrisonburg, VA 22801. Telephone Number: 540-432-0187.

*Mary Yonce*  
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Mary Yonce

District Ranger

*October 22, 2020*  
\_\_\_\_\_  
DATE

Appendices:

- A. Project Area Map

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Individuals who are deaf, hard of hearing or have speech disabilities and you wish to file either an EEO or program complaint please contact USDA through the Federal Relay Service at (800) 877-8339 or (800) 845-6136 (in Spanish).

Persons with disabilities who wish to file a program complaint, please see information above on how to contact us by mail directly or by email. If you require alternative means of communication for program information (e.g., Braille, large print, audiotape, etc.) please contact USDA's TARGET Center at (202) 720-2600 (voice and TDD).